

# STANTON TELEPHONE

December 17, 1993

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street Northwest  
Washington, D.C. 20554

RE: PP Docket No. 93-253

Dear Mr. Caton:

I am writing to express my support for the positions and proposals in the above mentioned docket. The positions are summarized on the attachment to this letter.

We believe the positions and proposals stated the objectives of the Congressional mandate. Further, the positions and proposals will ensure the deployment of personal communications services in rural America.

Sincerely,

STANTON TELEPHONE COMPANY

Robert J. Paden  
Vice President/General Manager

RJP/dk

Enc.

cc: Congressman Doug Bereuter  
Senator J. James Exon

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STANTON, NEBRASKA 68779

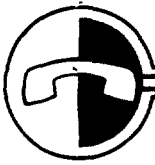
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## ATTACHMENT

### SUMMARY OF POSITIONS

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Entities applying to utilize available spectrum as an "intermediate link" between other facilities should only be subject to a competing application by an applicant that proposes to utilize (not resell) the spectrum for a similar purpose.

Only open oral (including real-time electronic) bidding should be permitted in order to promote an open, fair process.

Smaller bands of spectrum should be auctioned first. Within each block, areas should be auctioned from least to most population.

Combined bidding should not be permitted. If permitted, sealed bidders should not be permitted to participate in the oral bidding for the individual licenses.

Minimum bids may artificially limit participation of potential service providers.

Full payment from all bidders except "designated entities" (i.e., rural telcos, small businesses, and businesses owned by women and minorities) should be a condition of receiving the license.

Independents should qualify for a preference based on two factors: as a rural carrier and as a small business. A rural telephone company should be defined as one serving fewer than 50,000 access lines or, alternatively, as one that serves communities with population less than 10,000.

Independents should be eligible for designated entity preferences for licenses in all areas, both inside and outside their telephone service areas.

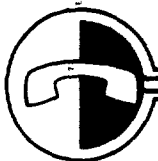
With regard to PCS, rural telcos should be eligible to bid for the channel blocks set aside for designated entity groups. Rural telcos that lose the bid for the set-aside blocks should be permitted to apply to partition the license area prior to construction by the successful bidder.

Designated group should be entitled to certain preferences in bidding for any channel block, including deferred payment of the bid price. Tax credits should be given to any entity that sell spectrum to a designated entity.

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Consortia eligible for preferences must be under the control of individuals and or entities that are individually eligible for the preference.

Transfer of licenses from one designated entity to another should not be restricted.

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